IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

- [1] WANDA VÁZQUEZ GARCED,
- [2] JULIO M. HERRERA VELUTINI,
- [3] MARK T. ROSSINI,

Defendants.

CRIMINAL NO. 22-342 (RAM)

UNITED STATES MOTION IN COMPLIANCE WITH COURT ORDER

The United States, by and through the undersigned attorneys, in compliance with the Court's Order (ECF No. 445), hereby responds to Defendant Herrera's request to change the viewing restriction of his Motion to Compel and to Exclude Evidence (ECF No. 438). The government does not object to redacted versions of these motions being made public, but would request that witness names, references to witnesses acting as confidential sources, and email addresses and other identifying information be redacted. The government would further request that references to uncharged criminal conduct be redacted as well. This is consistent with local practice, maintains the integrity of the Protective Order, and protects due process and fairness equities of potential witnesses and uncharged individuals.

WHEREFORE, the United States requests that the Court take notice of the foregoing and adjust the viewing restrictions with the above referenced redactions.

Certificate of Service

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

RESPECTFULLY SUBMITTED, this 4th day of January, 2024.

COREY R. AMUNDSON Chief, Public Integrity Section U.S Department of Justice

/s/ Nicholas W. Cannon

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